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IN THE

Supreme Court of the United States

OCTOBER TERM, 1983

SUN MYUNG MOON and TAKERU KAMIYAMA,

Petitioners,

v.

UNITED STATES OF AMERICA,

Respondent.

ON PETITION FOR CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

BRIEF *AMICUS CURIAE* FOR THE INSTITUTE FOR THE STUDY OF AMERICAN RELIGION IN SUPPORT OF PETITION FOR CERTIORARI

LEO PFEFFER
Counsel of Record
29 Ridge Terrace
Central Valley, N. Y. 10917
(914) 928-6409

Question Presented

Where a defendant in a criminal trial is the leader of a new or unpopular religion, and his trial inescapably entails judgments about his religious stewardship, does the Free Exercise Clause limit a trial court's authority to deny the defendant's request that he be granted a non-jury trial to minimize the influence of religious bias against him?

TABLE OF CONTENTS

PAGE

Question Presented i

Table of Authorities iv

Interest of *Amicus Curiae* 1

Statement of the Case 2

Summary of Argument 2

ARGUMENT—

I. An Historical Overview of Religious Persecution in America 3

A. The Historical Background 3

B. The Relevance of History 9

II. In the Circumstances of This Case, the Free Exercise Clause Required the Trial Court to Grant the Defendant's Request for a Non-Jury Trial 11

III. The Trial Court's Denial of the Defendant's Request for a Non-Jury Trial Threatens the Religious Liberty of All Communities of Believers 14

CONCLUSION 15

Table of Authorities

Cases:	PAGE
Associated Press v. *NLRB*, 301 U.S. 103 (1937)	13
Cantwell v. *Connecticut*, 310 U.S. 296 (1940)	8
Christofferson v. *Church of Scientology of California*, 57 Or. App. 203, 644 P.2d 277 (1982)	11
Craig v. *Harney*, 311 U.S. 367 (1977)	15
Follett v. *Town of McCormick*, 321 U.S. 573 (1944)	8
Holy Spirit Association for the Unification of World Christianity v. *Tax Commission*, 55 N.Y.2d 512 (1982)	10
Larson v. *Valente*, 456 U.S. 228 (1982)	14
Minersville School District v. *Gobitis*, 310 U.S. 586 (1940)	8
Murdock v. *Pennsylvania*, 319 U.S. 105 (1943)	8
NLRB v. *Catholic Bishop of Chicago*, 440 U.S. 490 (1979)	13
Prince v. *Massachusetts*, 321 U.S. 158 (1944)	12
Sherbert v. *Verner*, 374 U.S. 398 (1963)	12
Thomas v. *Review Board*, 450 U.S. 707 (1981)	12
Torcaso v. *Watkins*, 367 U.S. 488 (1961)	8
United States v. *Ballard*, 322 U.S. 78 (1944)	16
West Virginia State Board of Education v. *Barnette*, 319 U.S. 624 (1943)	8
Wisconsin v. *Yoder*, 406 U.S. 205 (1972)	12
Wood v. *Georgia*, 370 U.S. 375 (1962)	15

Other: PAGE

H. W. Barber, *Religious Liberty* v. *Police Power: Jehovah's Witnesses,* 41 American Political Science Review 226 (1947) 7

D. Bromley & A. Shupe, Jr., *"Moonies" in America: Cult, Church and Crusade* (1979) 16

D. Bromley & A. Shupe, Jr., *Strange Gods: The Great American Scare* (1981) 9, 16

S. Cobb, *The Rise of Religious Liberty in America* (1902) 6

The Coming Kingdom (M. D. Bryant & D. Dayton ed. 1983) 16

Alternatives to American Mainline Churches, (J. Fichter ed. 1983) 16

C. Glock & R. Bellah, *The New Religious Consciousness* (1976) 16

E. Humphrey, *Nationalism and Religion in America 1774-1789* (1924) 5

H. Kalven, Jr. & H. Zeisel, *The American Jury* (1966) 13

R. Manwaring, *Render Unto Caesar* (1966) 7

Matthew 5:10 (King James) 15

J. G. Melton & R. Moore, *The Cult Experience* (1982) 16

The Social Impact of New Religious Movements, (B. Wiilson ed. 1981) 16

L. Pfeffer, *Church, State and Freedom* (rev. 1967) 4

L. Pfeffer, *The Supremacy of Free Exercise,* 61 Geo. L. Rev. 1115 (1973) 12

A. Stokes, *Church and State in the United States* (1960) 4, 7

PAGE

A. Stokes & L. Pfeffer, *Church and State in the United States* (1964) 6, 7

Writings of James Madison (G. Hunt ed. 1909) 5

I. Zaretsky & M. Leone, *Religious Movements in Contemporary America* (1974) 16

Constitutional Provisions:

U.S. Const. amend. I ..... *passim*

U.S. Const. amend. V ..... *passim*

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Pursuant to Rule 36.1 of the Rules of this Court, this brief is filed with the written consent of counsel for the parties. Their original letters are filed with the Clerk of this Court.

Interest of *Amicus Curiae*

The Institute for the Study of American Religion (ISAR) is a scholarly research facility devoted to the study of American religious groups, particularly the smaller and minority religions, those which have most frequently been subjected to religious prejudice and intolerance.

Established in 1969, ISAR is a non-membership organization. Out of its research has come the *Encyclopedia of American Religion* (1978), the standard reference on American religious groups, as well as its companion volume, the *Directory of Religious Bodies in the United States* (1977).

The ISAR submits this brief out of its deep concern over the upsurge of religious prejudice against what are seen as unconventional religions in America. In particular, ISAR believes that the prosecution and conviction of Reverend Moon must be understood in the context of the long history of religious intolerance in this country.

Statement of the Case

Amicus curiae adopts, to the extent relevant, the Statement of the Case as set forth in the petition for certiorari.

Summary of Argument

The government's refusal to accede to petitioner's election of a non-jury trial in a prosecution for criminal tax fraud and conspiracy is but the most recent manifestation of a tragic history of unfair and unconstitutional efforts in America directed against new and unpopular religions, currently called "cults." History shows that such religions are frequently the subject of fear and hatred on the part of the general public from which a jury is drawn, as well as on the part of the nation's executive, legislative, and prosecutorial agencies.

These feelings of antipathy are too often manifested in efforts to destroy or at least to punish such religions, through whichever efforts, legal or non-legal, may prove effective. *Amicus curiae* submit that, irrespective of other guarantees contained in the Constitution and Bill of Rights, imposition of a jury trial upon the leader of a church in a criminal case directly involving his religious stewardship violates his Free Exercise rights—at least where, as here, the religious leader and his followers are demonstrably the targets of widespread fear and hatred. In insisting upon a jury trial in a criminal case against the leader of the international Unification Church, the government practically assured itself of a conviction. Thus obtained, the conviction is a violation of the petitioner's constitutionally protected rights.

I.

An Historical Background of Religious Persecution in America.

A. *The Historical Background.*

In order to grasp the magnitude of error in the Second Circuit's affirmance of the trial court's refusal to accede to the petitioner's request for a non-jury trial, a brief survey of the historical setting is in order. For we do not think that the trial judge was correct, at least in respect to the application of the Religion Clauses, in implying that the present case is *sui generis*.[1]

The history of the struggle for religious freedom and church-state separation is in large measure one against persecution and for equality of treatment on behalf of religions which in their formation days were hated and feared by the general community. It was the purpose of the Religion Clauses in the First Amendment (as well as the ban in Article VI on religious tests for public office) to bring an end to discrimination against these religious groups.

Many, if not most of those who settled in what is now the United States, did so to escape religious persecution and discrimination in England. Unfortunately, the majority of them manifested little reluctance to impose upon religious non-conformists on these shores what they themselves had suffered in England. Nor did they hesitate to use the instrumentalities of law to effectuate their purposes.

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[1] The judge said: "Let me say that I think Reverend Moon is *sui generis*. I don't think there is anyone is this country similar to him . . . I am not so naive as to believe that if Reverend Moon was a non-controversial person whose religion was Pollyannish, who nobody took exception to, that the government would not have had as much interest in looking at his taxes as they did . . ." 836-37. References to the trial transcript will be designated as "T—"; to post-trial transcripts "S—"; to pre-trial transcripts "P—"; and to pleadings "A—".

What follows in this section is a brief survey of how our forefathers dealt with religious dissidents such as those who would be today called "cultists." Among these were Baptists, Unitarians, Friends, Catholics, Jews, Mormons, Adventists, Amish, Jehovah's Witnesses, and many others. What members of these faiths share is a history of discrimination through a variety of legal and extra-legal devices all having the purpose of destroying those who were viewed as the particular social enemy at a given time in our history. Reflecting in their actions the prejudice of the communities which empowered them to act, governmental authorities visited upon such despised groups penalties ranging from banishment, fines, and imprisonment, to the use of stocks for public derision and scorn. Indeed on occasion other, more severe penalties—including death—were imposed.[2]

In significant ways the present hysterical reaction to "cults", the consequent trials and the inevitable guilty verdicts are reminiscent of the anti-witchcraft trials evoked by Cotton Mather in Salem, Massachusetts, and spread elsewhere in the colonies in the 17th century. In one Salem case, all twelve of the jurors later signed a statement admitting their error in handing down guilty verdicts. Of the defendants in other widespread jury trials (involving several hundred young women and "afflicted children"), nineteen were hanged.[3]

In the same period, Anne Hutchinson and her brother-in-law Reverend John Wainwright were banished for heresy in preaching the covenant of grace rather than of works. So, too, was Roger Williams, a founder of the Baptist Church in North America.[4]

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[2] L. Pfeffer, *Church, State and Freedom* 76 (rev. 1967).

[3] I A. Stokes, *Church and State in the United States* 169-70 (1960).

[4] In the present case insofar as they opposed his motion for a recommendation against deportation, the government sought the

Roger Williams' experiences of prejudice because of his religion were shared by other Baptists, who, however, suffered imprisonment rather than exile. During the "period of the Great Persecution" (1768 to 1774), they were whipped, beaten, arrested, fined and imprisoned, sometimes living only on bread and water.[5] In 1774 James Madison wrote to a friend:

> That diabolical, hell-conceived principle of persecution rages among some. . . . This vexes me the worst of anything whatever. There are at this time in the adjacent county not less than five or six well-meaning men in close jail for publishing their religious sentiments, which in the main are very orthodox. I have neither patience to hear, talk, or think of anything relative to this matter; for I have squabbled and scolded, abused and ridiculed, so long about it to little purpose, that I am without common patience. So I must beg you to pity me, and pray for liberty of conscience to all.[6]

Members of a religious "cult", formally called the Society of Friends, but popularly and derisively known as "Quakers" (just as adherents to the Unification Church are called "Moonies"), were another religious sect who suffered persecution (in a few cases even through a death sentence) because their beliefs were unacceptable to the people. So, too, were the Catholics, popularly and derogatorily called "Papists". Except in Maryland, where Catholics constituted a majority, they were widely subjected to religious

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banishment of Reverend Moon through deportation, but the trial judge refused to concur. S190-91. In addition, the government returned the indictment while Reverend Moon was out of the country and might perhaps have been tempted to not return. S.162.

[5] E. Humphrey, *Nationalism and Religion in America 1774-1789* at 368-69 (1924).

[6] I *Writings of James Madison* 18-21 (G. Hunt ed. 1900-1909).

discrimination and group defamation. The General Court of Massachusetts, for example, decreed in 1647 that

> [n]o Jesuit or ecclesiastical person ordained by the pope or the see of Rome shall henceforth come into Massachusetts. Any person not freeing himself of suspicion shall be jailed, then banished. If taken a second time, he shall be put to death.[7]

In 1689, a new charter was granted decreeing that "forever thereafter there shall be liberty of conscience allowed in the worship of God to all Christians (except papists)." [8]

This fear and hatred of Catholics endured well into the 20th century. Although a Catholic (Roger Taney) could be appointed Chief Justice of the Supreme Court in 1837 with the consent of the Senate, it was more than a century later before one could be elected President. Incorporation statutes, with the Catholic Church in mind, often required lay representation on the boards of directors in respect even to properties used exclusively for religious purposes.[9] In the mid-19th century, the Nativist or "Know-Nothing" Party stated its comprehensive purpose as "Anti-Romanism, Anti-Bedinism, Anti-Pope's Toeism, Anti-Nunnerism, Anti-Winking Virginism, Anti-Jesuitism, and Anti-the-Whole-Sacredotal-Hierarchism with all its humbugging mummeries." [10]

That this Party was in tune with popular prejudice is evidenced by the fact that, for a time, it was able to capture the legislatures in quite a number of states. In Con-

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[7] S. Cobb, *The Rise of Religious Liberty in America* 177 (1902).

[8] *Id.* at 233.

[9] A. Stokes and L. Pfeffer, *Church and State in the United States* (1964).

[10] *Id.* at 236.

necticut, for example, it was able to enact a law requiring corporate rather than individual holding of property.[11] In Massachusetts the Know-Nothing legislature appointed a "Nunnery Committee" to report on "such theological seminaries, boarding schools, academies, nunneries, convents, and other institutions of like character as they may deem necessary."[12] The appointment of such a committee reflects a widespread belief that young women did not voluntarily commit themselves to serving their religion as nuns but were the victims of physical duress or "mind-control" (a belief reflected today in a practically universal assumption respecting "cults"). There was, indeed, strong condemnation of convents on the ground that unlawful means were supposedly used to force young women into them.[13]

Perhaps the faith which in recent years has been, more than any other, the victim of prejudice, hatred and fear—incorporated in legislation, and manifested in criminal prosecutions and guilty verdicts—is that of the Jehovah's Witnesses. But the Witnesses are now an accepted member of the family of American faiths. They reached that enviable station only after a period of trials and tribulations instigated by government officials hostile to their beliefs and practice. New laws were enacted and old laws resurrected to supply weapons to curb their activities and, if possible, to completely destroy them. All kinds of laws were used or were attempted to be used for that purpose—anti-peddling ordinances, traffic regulations, revenue laws, laws forbidding the use of sound trucks, and many others were invoked against them.[14]

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[11] *Id.* at 237.

[12] *Id.*

[13] III A. Stokes, *Church and State in the United States* 818-22 (1950).

[14] H. W. Barber, *Religious Liberty* v. *Police Power: Jehovah's Witnesses*, 41 American Political Science Review 226 (1947). *See also* R. Manwaring, *Render Unto Caesar* (1966).

America owes a great debt of gratitude to the Witnesses insofar as much of the current law relating to religious freedom resulted from the Witnesses' persistence in asserting their constitutional rights and appealing adverse verdicts to the Supreme Court. The hostility vented against the Witnesses was in large measure motivated by what was generally considered to be their non-Americanism in refusing to salute or pledge allegiance to the flag[15]—just as prejudice against Reverend Moon's Korean origins may in part account for his own plight in this case. Another and no less substantial a factor in the persecution of the Witnesses was their criticism of recognized and respected religions, particularly Catholicism, itself a formerly reviled faith.[16]

It is difficult to believe, until the Witnesses survived persecution and prejudice and were generally considered to be a legitimate faith, that they could receive a fair and impartial verdict from juries anywhere in the United States; and this is so no matter how emphatically prospective jurors asserted in voir dire that they would not allow their own religious biases to influence their verdict. Nevertheless, automatic exclusion of Catholics as a group from juries in criminal trials against Jehovah's Witnesses would obviously have violated the Constitution.[17] Indeed, it is by no means certain that the Constitution would even have permitted questioning veniremen as to the content of their religious beliefs and practices. Thus the only practical remedy available to Jehovah's Witnesses in most cases would have been to do what the defendant in the present case sought

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[15] *See Minersville School District* v. *Gobitis*, 310 U.S. 586 (1940); *West Virginia State Board of Education* v. *Barnette*, 319 U.S. 624 (1943). *See also Murdock* v. *Pennsylvania*, 319 U.S. 105 (1943); *Follett* v. *Town of McCormick*, 321 U.S. 573 (1944).

[16] *See Cantwell* v. *Connecticut*, 310 U.S. 296 (1940).

[17] *Torcaso* v. *Watkins*, 367 U.S. 488 (1961).

to do, that is, to waive a jury trial to protect himself from religious prejudice. *We are aware of no other case in which the government has ever vetoed a defendant's exercise of this right in such circumstances.*

B. *The Relevance of History.*

The foregoing account, we suggest, indicates quite clearly that, throughout our history, persons who, in the arena of religion, have at various times been called heretics, atheists, nonconformists, sectarians, and other such sobriquets, have been the subjects of persecution at the hands of secular governmental authorities—including lawmakers, prosecuting attorneys, and jurors. What was true in the past in respect to these faiths is at least equally true today in respect to new religious groups now commonly called "cults."

It should be noted that the term "cults," though originally neutral,[11] has now become an intensely derogatory appellation; and of various "cults" today, the "Moonies" undoubtedly comprise the most despised of all. Indeed, the very term "Moonie," like the term "cult," is an expression of derision. It is simply impossible to believe that the jurors were not aware that the defendant was the head of the "Moonies", the most notorious of all "cults." Indeed, Reverend Moon himself is the focal point of the group's notoriety. The fact that the jurors themselves were aware of this notoriety was fully borne out by the voir dire. T. 473, 847-48, 857, 1391, 1394, 1514-15, 2052, 2106.

There was simply no practicable means to isolate the jurors from what was known or assumed throughout the United States and its Territories, as distant from New York as Guam. This was verified by the random survey of 1,000 persons in the Southern District conducted under

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[11] "Sociologically, a cult is the starting point of every religion . . . Jesus and his twelve disciples offer a classic example of a cult." D. Bromley & A. Shupe, Jr., *Strange Gods* 23 (1981).

the direction of Stephen Roth, which showed that more than 40% of the respondents indicated that they were ready to "throw the Reverend Sun Myung Moon in jail without hearing any evidence or even knowing the charges against him, if any." A822-23.

While the terms "brainwashing" and "cults" frequently mentioned in Roth's survey may not have originated in respect to Reverend Moon, their widespread use, always in a derogatory sense, is a fact which, we suggest, is judicially noticeable. So, too, is the term "Moonies."

"Cultists," generally, and "Moonies," specifically, have been verbally pummeled and degraded in all media of mass communication—radio, television, newspapers, magazines, and cinema. At least three commercially presented motion pictures, depicting "cultist" leaders as villains, and the people flocking to them as dupes—"Ticket to Heaven", "Moon Child" and "Split Images"—have been exhibited in recent years.

Historically the transition from "cultism" to the status of an accepted faith or religion varies in respect to time. It was two centuries after the deaths of Jesus and his eleven disciples (Judas having hanged himself), by the grace of the emperors Constantine and Licinius, that Christianity was promoted from "culthood" to this coveted status. In the United States, of course, such an elevation cannot be formalized by government action because of the First Amendment's ban on laws respecting an establishing of religion. The nearest we can come to such formal approval is the grant of tax exempt status and income tax deductibility for contributions, benefits made available to the Unification Church, T4273, *see Holy Spirit Association for the Unification of World Christianity* v. *Tax Commission*, 55 N.Y.2d 512 (1982) and not challenged by the government in this case. As this case attests, however, even the conferral of such benefits on a church does not assure freedom from persecution for the church's leaders.

Government recognition of the Unification Church's tax exempt status cannot mitigate the hatred, fear and animosity visited upon Reverend Moon or upon his Church. Nor can it be expected that these intense feelings will or can be set aside when the public acts through its jury system against any "cult." Thus, in October, 1979, a jury in Portland, Oregon, after 18 hours deliberation following four weeks of testimony, handed down a verdict for $2,067,000.20 against the Church of Scientology, another "cult", which allegedly defrauded the plaintiff by inducing her to pay tuition in the sum of $3,000.20 for courses at the church school. The gravamen of her complaint was that the church had falsely represented that she would receive superior psychological understanding and additional capabilities in her civil engineering field. Of the $2,067,000.20 verdict, wholly $2,000,000 represented punitive damages.[19] It hardly seems likely that a bench trial would have resulted in the same verdict or anything near it.

II.

In the Circumstances of This Case, the Free Exercise Clause Required the Trial Court to Grant the Defendant's Request for a Non-Jury Trial.

As the historical record demonstrates, religious liberty in this country has been repeatedly put at risk—despite the fact that the Europeans who first settled the land were themselves victims of religious persecution. Nevertheless, because of our unique historical commitment as a people to religious freedom—a commitment to which we have, tragically, not always been true—our Bill of Rights accords even greater latitude for religious liberty than for other protected rights. Thus, although in some contexts

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[19] On appeal to the Oregon Court of Appeals, the judgment was reversed and remanded. *Christofferson* v. *Church of Scientology of California*, 57 Or. App. 203, 644 P.2d 2877 (1982).

"freedom of conscience [may not claim] a broader protection than freedom of mind," *Prince* v. *Massachusetts*, 321 U.S. 158, 164 (1944), religious liberty under the Free Exercise Clause generally is accorded leeway not afforded other rights that also occupy "a preferred position in our basic scheme." *Id.*[29] We submit that, irrespective of other clauses in the Constitution and Bill of Rights, imposition of a jury trial upon the leader of a church in a criminal case directly involving his church leadership violates the Free Exercise Clause in respect to him and the church, at least where there is, among the general population, a universal fear and hatred of both.

The Supreme Court's precedents make clear that such special deference must be accorded to rights protected by the Free Exercise Clause. For example, the Supreme Court has invalidated under the Free Exercise Clause a state statute which denied unemployment compensation to a Sabbatarian whose religious conviction impelled refusal to accept a job offer that required working on Saturdays. *Sherbert* v. *Verner*, 374 U.S. 398 (1963). It is fair to assume that the decision would not have been the same if the plaintiff had pleaded the right not to be penalized for missing work to attend Saturday meetings of his political party.

Similarly, in *Thomas* v. *Review Board*, 450 U.S. 707 (1981), the Supreme Court ruled unconstitutional under the Free Exercise Clause the denial of unemployment compensation to a claimant whose religious commitments forbade working in a plant manufacturing war materials. It may be assumed that the result would not have been the same if the refusal had been based on a general intellectual conviction as to the futility of all wars.

And in *Wisconsin* v. *Yoder*, 406 U.S. 205 (1972), the Supreme Court held violative of the Free Exercise Clause

[29] *See also* L. Pfeffer, "The Supremacy of Free Exercise," 61 Geo. L. Rev. 1115 (1973).

a statute requiring school attendance until the age of 16, as the law was applied to children of the Amish faith which forbids attendance beyond the age of 14. Such indulgence would presumably not be extended to a parent who wished to keep his child at home after age 14 on non-religious grounds.

Finally, in *NLRB* v. *Catholic Bishop of Chicago*, 440 U.S. 490 (1979), the Supreme Court noted that there would be a significant risk of infringement of the Religion Clauses if the National Labor Relations Act were construed to confer NLRB jurisdiction over church-operated schools. Accordingly, the Court construed the act as exempting such schools. This it did notwithstanding the fact that in *Associated Press* v. *NLRB*, 301 U.S. 103 (1937), the Court upheld application of the law to news organizations over First Amendment objections that freedom of the press would be endangered thereby.

The import of these cases is clear. Whatever might be the situation in the case of a criminal defendant requesting a non-jury trial to minimize the risk of political oppression or even racial prejudice, the Free Exercise Clause mandates special deference to such a request in the case of a criminal defendant seeking to minimize *religious* prejudice at his trial—especially a defendant who leads a new and unpopular religion, whose trial inescapably entails judgments about whether assets he claims to hold for that religion instead belong to him personally. *United States* v. *Moon*, 718 F.2d at 1217. Such judgments go to the heart of his religious stewardship, and thus present an unusually sharp risk of bias.[11]

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[11] *Cf.* H. Kalven, Jr. & H. Zeisel, *The American Jury* 24 (1966): "In rare instances . . . the court will insist that the public requires jury trial; and at least in a few cases the prosecution has refused to consent to jury waiver possibly as a tactical move to disadvantage the defendant . . . However even in the Federal courts such refusal by the prosecutor is an extremely rare event."

III.

The Trial Court's Denial of the Defendant's Request for a Non-Jury Trial Threatens the Religious Liberty of All Communities of Believers.

Ever since Madison's Memorial and Remonstrance and Jefferson's Virginia Statute for Establishing Religious Freedom, it has been recognized that taxation has the potential for impairing religious freedom. It is clear that a tax law expressly aimed at disfavored religions, or the discriminatory application of a facially neutral tax law against them, would violate the Free Exercise Clause. *See also Larson* v. *Valente*, 456 U.S. 228 (1982).

What we argue here is that the government's attorneys in the present case sought to accomplish through the jury what the Supreme Court has made clear in the cases described above may not be constitutionally done—that is, to penalize the exercise of religious rights. We believe that the government here prosecuted a controversial religion's leader for not paying a religiously neutral tax for the purpose of destroying or seriously injuring his religion. Indeed, we need not go that far, but need only urge that the risk that the jury would misuse a neutral tax law to injure the defendant and his religion entitled him to choose a bench trial, and thus to rely upon the fairness of the trial judge.

We do not maintain that the result in this case would necessarily have been different had the case been tried to a judge without a jury. What is contended here is that the petitioner's conviction would not have been virtually preordained in a bench trial. Thus the petitioner at least should have been allowed to place his trust in the court rather than in a jury. We submit that it was reversible error for the trial court not to allow him that option.

We suggest that, if juries are allowed to translate their fear and hatred of "cults" into guilty verdicts in criminal trials, or into exorbitant damage awards in civil cases, such groups may well find that, in order to survive, they have no choice but to radically alter their sincerely and deeply held religious beliefs and practices—lest they and their leaders "[be] persecuted for righteousness sake." *Matthew* 5:10 (King James). This result, we respectfully submit, would constitute the very antithesis of religious liberty.

CONCLUSION

Our brief has been limited to the Free Exercise Clause; we do not intend thereby to suggest that no other constitutionally protected rights are implicated. To the contrary, several clearly are. The government's intent to punish Reverend Moon for what he said in front of the courthouse, A811-12, and for his advertisement in the *New York Times*[22]—manifested by its demanding a jury trial in which conviction was practically inevitable—clearly violated the Free Speech and Free Press Clauses.[23] The guarantee of a fair trial inherent in the Due Process Clause was also undermined in a myriad of ways—for example, the defendant, forced to try the case to a jury, had to play down any "religious defense" that might have inflamed juror prejudice.

However, limiting ourselves to the Free Exercise claim, we submit that the evidence in this case and the facts judicially noticeable lead to but one conclusion: there was no realistically feasible means of constituting a jury untainted by the prejudicial influences of a society extremely

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[22] Reverend Moon stated: "I would not be standing here today, if my skin were white and my religion were Presbyterian." A815.

[23] *See Craig* v. *Harney*, 311 U.S. 367 (1977); *Wood* v. *Georgia*, 370 U.S. 375 (1962).

hostile to the "Moonies," and particularly to Reverend Moon himself, the petitioner herein.

Many recent, serious sociological studies treat the "Moonies" and other "cults" scientifically and objectively.[24] Members of this or any other jury, however, generally do not read such scientific books.[25] Rather, they are continually lambasted by hostile accounts and lurid descriptions of "cults" in newspapers, magazines, radio and television broadcasts, and motion pictures.

Even if sequestered, juries cannot be insulated from these prior influences, and when, as in the present case, they are not sequestered, the added possibility of prejudicial influence from their families, friends and neighbors —practically all of whom share their feelings of hostility and fear—unavoidably aggravates the situation.[26]

In a case such as the present one, the Constitution's guarantee of the free exercise of religion, as well as basic concepts of justice and fair play, mandate that the trial court honor a defendant's request for a bench trial not-

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[24] *See, e.g.*, I. Zaretsy & M. Leone, *Religious Movements in Contemporary America* (1974); D. Bromley & A. Shupe, Jr., *Strange Gods: The Great American Scare* (1981); D. Bromley & A. Shupe, Jr., *"Moonies" in America: Cult, Church and Crusade* (1979); C. Glock & R. Bellah, *The New Religious Consciousness* (1976); *Alternatives to American Mainline Churches* (J. Fichter ed. 1983); *The Coming Kingdom* (M.D. Bryant & D. Dayton ed. 1983); J.G. Melton & R. Moore, *The Cult Experience* (1982); *The Social Impact of New Religious Movements* (B. Wilson ed. 1981). All of these works have extensive bibliographies.

[25] In fact the trial judge recognized that "in attempting to get an unbiased jury, the leaning has been heavily towards people who won't read much, don't talk much and don't know much . . ." T1759-60.

[26] Admonitions by the trial judge not to discuss the case while it is pending, when directed at "a jury in a hostile environment," *United States* v. *Ballard*, 322 U.S. 78, 87 (1944), are not only unenforceable but are, realistically speaking, futile.

withstanding the prosecutor's refusal to consent. We submit that for all the foregoing reasons, the petition for certiorari should be granted.

Respectfully submitted,

LEO PFEFFER
Counsel of Record
29 Ridge Terrace
P. O. Box 261
Central Valley, N. Y. 10917
(914) 928-6409

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